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United States Department of the Interior
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Long Island Offshore Wind Park
Scoping Comments
for
Environmental Impact Statement
Comments
By
WindWorks Long Island

WindWorks Long Island (WindWorks) is a unique partnership of local, regional, and national environmental, civic, health, business and faith-based groups that supports the concept of harnessing offshore wind power, and works to bring the environmental, economic and public health benefits of offshore wind to Long Island. WindWorks supports and promotes through advocacy, education and public outreach the development of clean, renewable energy resources as defined under the New York State Renewable Portfolio Standard (RPS) adopted in 2004.

We appreciate the opportunity to provide comments in response to MMS's Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) on the Long Island Offshore Wind Park (LIOWP) proposed to be sited on the Outer Continental Shelf off Long Island's south shore.

WindWorks strongly supports responsible development of renewable energy sources on the Outer Continental Shelf (OCS) in general, and the development of a responsible Long Island wind project. We believe that clean, renewable energy such as wind is much needed on Long Island to help reduce air pollution and human health impacts, to reduce our dependence on foreign fossil fuels, and to reduce greenhouse gases that contribute to

climate change. However, we can only support such development if it is done in an environmentally acceptable and sustainable manner, protecting our valuable marine life and coastal and ocean ecosystems, minimizing impacts on local and migratory bird populations, and avoiding unnecessary visual and noise impacts. During environmental and regulatory review processes of proposed projects, we must assess these potential negative impacts and weigh them against significant positive environmental impacts and public benefits that renewable energy projects provide when compared to conventional electricity generation.

Since this project could be the first offshore in the nation and therefore will serve as a national model, it carries high significance to the future of offshore wind development in the United States. Therefore, given that the U.S. experience with offshore renewable energy projects is new, we believe that it is of paramount importance to ensure that the proposed LIOWP project undergoes a thorough, rigorous and site specific environmental and regulatory review. Below, we offer the following issues for consideration for Scoping Issues as part of the EIS:

Environmental

1. Bird Impacts

   a. Baseline of bird activity: Scientifically valid methods should be used to determine the level of bird activity, by species, at the proposed site. A special effort to identify migratory, and endangered or threatened species should be made.

   b. Review data from existing wind farms that use comparable technology to determine the likelihood of impacts on bird species found in the area.

   c. The DEIS should review and assess the possibility and feasibility of certain design mitigation measures of the project as it relates to bird mortality. These mitigation measures might include proper lighting that is the least disruptive; lack of perches or projections that can attract birds; lack of guy wires, and certain colors and patterns of the surface of the towers and rotors.

2. Impacts on marine life

   a. Analysis should take place to evaluate impacts on marine life and habitat. Special emphasis should be placed on impacts on endangered or threatened species and marine mammals from the monopoles, or from potential underwater noise or vibrations during construction, operation, and decommissioning.

   b. Analysis should take place to evaluate impacts on ocean bottom (benthic) organisms and habitat, with particular emphasis on endangered or threatened species.

   c. Potential for offshore substation to leak stored lubricating oil or diesel and the possibility of using a cleaner alternative such as biodiesel, and also the potential for gear box lubricants to leak.

3. Impacts on sand deposition

a. Analysis should take place to evaluate whether the wind park will change the pattern of sand deposition along the shore, and/or cause extra erosion of shoreline.

4. Impacts from Construction & Installation

a. Review potential impacts on neighboring communities and wildlife habitat from construction of wind park, staging areas, and extra boat traffic.

b. Review potential impacts on neighboring communities and wildlife habitat from installation of the electrical cable that will bring electricity from the offshore substation through Clocks Blvd. to the Sterling substation, such as noise & street disruption.

Positive Health and Environmental Impacts

Potential negative environmental impacts must be weighed against *positive* impacts or benefits that are typically derived from renewable energy projects, vs. the "no action" alternative, i.e. continued fossil fuel extraction and power generation, including:

5. Pollution avoidance and public health benefits - given studies such as *Dirty Air, Dirty Power: Mortality and Health Damage Due to Air Pollution from Power Plants*, by Clear the Air/Clean Air Task Force, June 2004, which used U.S. Environmental Protection Agency approved methodology, can we quantify the number of illnesses and deaths averted on Long Island by the power plant pollution reduced by adding the wind park to the grid?

a. We recommend that Minerals Management Services create a comparison among specific criteria pollutants offset such as NOx, SOx, and particulates between wind generated energy and that produced by local power plants, including the impacts of mining fossil fuels.

b. The comparison should also include pollutants avoided if the projected 140mw were generated using nuclear power, looking at the impacts to the environment and local communities that occur during the entire fuel cycle - from the mining of uranium to the disposal of radioactive waste. Among the other impacts to be considered is fishkill associated with impingement and entrainment in a plant's cooling intake systems.

6. Pollution avoidance resulting in improved air/water quality and reduced impacts on wildlife.

7. Quantify greenhouse gas emission avoidance, specifically CO2, and level of mitigation of global warming and climate change impacts.

8. Quantify mercury emission avoidance.

Economic & Societal

9. Impacts (positive or negative) on tourism, beach activities, boating and other recreational uses

10. Impact on commercial and recreational fisheries

a. Review existing data on whether monopoles create an artificial reef

b. Review configuration of turbines and distance between them to mitigate impacts on operation of fishing vessels.

11. (Positive) impacts on local, regional and national economy due to avoidance of purchase of imported fossil fuels

12. (Positive) impact on price stability of electric rates to LIPA customers

13. (Positive) impacts on economy due to job creation and other secondary or indirect economic benefits typical of renewable energy technologies

14. (Positive) impacts on national security, and on secure energy supply and diversified energy portfolio

Other Issues

15. Ways to mitigate aesthetic impacts from turbines - e.g.color, style/model, and layout or arrangement of turbines, use of safety or navigational lighting

16. Evaluate impact, if any, on property value of those homes within the project's view-shed.

17. Since opponents have claimed failure of offshore wind parks in Europe, the EIS should clarify the success/failure of such wind parks financially, in terms of greenhouse gas offsets, and in terms of public acceptance.

18. Will the wind park area be closed to recreational & commercial fishing? (WindWorks sees no need for an exclusion zone.)

19. Will electromagnetic fields from the cable cause an impact to human health and/or marine species?

20. We suggest that Minerals Management Services create a scientifically valid model to demonstrate how far sound may travel from the wind park.

21. While it seems unlikely due to the distance from shore and the height of the turbines, the EIS should clarify whether the wind park will impact on bats.

For any of the above scoping issues with potential negative impacts, we suggest that there be a mitigation plan, or an agreement between the developer and MMS that if there are unforeseen problems during or after construction, the developer formally agrees to mitigate those to the extent possible.

We further anticipate that all agencies involved at the federal and state level will take into account comments submitted and address reasonable issues raised that may not be expressed herein. Part of the success of this project will be in addressing and mitigating concerns and producing a thorough EIS that will satisfy reasonable questions raised.

In addition, over the course of several years of public outreach, many issues the coalition believes are less legitimate have been raised by those opposed to the project at meetings, the public hearings, and in the press. WindWorks would like to emphasize that the following issues do not require the same level of inquiry as the scoping issues before-stated because they seem on their face to be not credible. However, while not the focus of the EIS, WindWorks would like a formal statement to be able to dismiss the following issues since they have been raised in a public forum and have led to misinformation.

1. The transmission cable from the turbines to the Sterling substation will leak oil.
2. The wind park will impact local wind patterns because the turbines "take" the wind.
3. The wind park will impact Long Island groundwater.
4. The wind park will impact navigation radar and aviation equipment.
5. The wind turbines are noisy and will be heard from shore.
6. Lighting will distract or attract birds and lead to more kills.
7. The electromagnetic fields surrounding the wind park and transmission cable will attract sharks.
8. The wind park will create a "flicker" effect as light passes through the moving turbines.
9. Vibration from the wind park will harm family pets in the surrounding communities.

Windworks Long Island would like to thank the Minerals Management Service for this opportunity to comment.

Respectfully submitted by:
WindWorks Long Island

Date: August 18, 2006

Signed,

WindWorks Long Island Executive Board

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Jason K. Babbie, New York Public Interest Research Group
Kyle Rabin, Friends of the Bay
Bob DiBenedetto, Healthy Planet

Other WindWorks Long Island Coalition members:

America the Beautiful of Nassau County
Citizens Advisory Panel
Earth Echo International
EarthSave LI

Environmental Advocates of NY
Grassroots Environmental Education
Greenpeace
Huntington Breast Cancer Action Coalition
Long Island Citizens Action Network
Long Island Mid-Suffolk Business Association
Natural Resources Defense Council
New York League of Conservation Voters
Pace Law School Energy Project
P.E.A.C.E. of Long Island University
Prevention is the Cure
Renewing Community Earth
Riverkeeper
Sophia Garden
Sustainable Energy Alliance of LI
The Hydrogen Institute Center at SUNY Farmingdale
Union of Concerned Scientists

www.WindWorks4LI.org

Note: Individual member groups of WindWorks Long Island also submitted comments separately.